

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b>
<b>v.</b>	:	<b>DATE FILED: _____</b>
<b>NAJEE CUNNINGHAM</b> a/k/a "Disheem Thomas," <b>JAMES CUNNINGHAM</b> <b>RICKIA ADAMS</b> a/k/a "Kia"	:	<b>VIOLATIONS:</b> 18 U.S.C. § 371 (conspiracy – 1 count) 18 U.S.C. § 922(a)(1)(A), 924(a)(1)(D) (dealing in firearms without a license – 1 count) 18 U.S.C. § 922(g)(1) (possession of a firearm by a felon – 1 count) 18 U.S.C. § 2 (aiding and abetting) Notice of forfeiture

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. Defendant NAJEE CUNNINGHAM was not a federal firearms licensee (FFL), and was not licensed to deal in, manufacture, import, or collect firearms under federal law.
2. Defendant JAMES CUNNINGHAM was not an FFL and was not licensed to deal in, manufacture, import, or collect firearms under federal law.
3. Defendant RICKIA ADAMS was not an FFL and was not licensed to deal in, manufacture, import, or collect firearms under federal law.
4. The following businesses possessed an FFL license and were authorized to deal in firearms under federal laws:

<u>FFL</u>	<u>Location</u>
Jim's Pawn & Guns	4212 Oleander Drive, Wilmington, North Carolina
Jim's Gun Shop	609 Woodland Road, Raleigh, North Carolina
Shoot Point Blank (West)	7266 Harrison Avenue, Cincinnati, Ohio
Liberty Guns & Equipment	214 E McIntyre Street, Mullins, South Carolina
Schofield Ace Hardware	155 S Cashua Drive, Florence, South Carolina
Academy Sports	120 Woody Jones Boulevard, Florence, South Carolina
Elite Pawn & Gun	7539 Garners Ferry Road, Columbia, South Carolina
Carolina Gun Runners	1141 Falls River Avenue STE 110, Raleigh, North Carolina
Academy Sports	1151 Pine Plaza Drive, Apex, North Carolina
Shoot Point Blank (Blue Ash)	10930 Deerfield Road, Cincinnati, Ohio

5. FFL holders are licensed, among other things, to sell firearms. Various rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms.

6. The rules and regulations governing FFL holders require that a person seeking to purchase a firearm fill out a Firearm Transaction Record, ATF Form 4473 ("Form 4473"). Part of the Form 4473 requires that the prospective purchaser certify that all his or her answers on Form 4473 are true and correct. The buyer is required to include his or her home address. Also, a portion of the Form 4473 requires that the prospective purchaser certify truthfully, subject to penalties of perjury, that he or she is the actual buyer of the firearm. The Form 4473 contains the following language in bold type: **"Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you."** In the certification section of the Form 4473, the actual buyer must certify that his or her answers to the questions on the form are "true, correct, and complete," and acknowledge by his or her signature that "making any false oral or written statement . . . is a crime punishable as a felony under

Federal law, and may also violate State and/or local law.”

7. FFL holders are required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, to ensure that the person was not prohibited from purchasing a firearm. For example, convicted felons are persons prohibited by law from buying firearms.

8. A person who purchases a firearm at the behest of another person and falsely states on the Form 4473 that he or she is the actual buyer of the firearm is known as a “straw purchaser.”

9. From in or about August 2020 through on or about June 18, 2021, in the Eastern District of Pennsylvania, the Eastern District of North Carolina, the Southern District of Ohio, the District of South Carolina, and elsewhere, defendants

**NAJEE CUNNINGHAM,  
a/k/a “Disheem Thomas,”  
JAMES CUNNINGHAM, and  
RICKIA ADAMS,  
a/k/a “Kia,”**

conspired and agreed, together and with others, known and unknown to the grand jury, to commit offenses against the United States, that is, to make a false statement with respect to the information required to be kept in the records of a federally licensed firearms dealer, in violation of Title 18, United States Code, Section 924(a)(1)(A); and to engage in the business of dealing in firearms without being licensed to do so, in violation of Title 18, United States Code, Section 922(a)(1)(A).

**MANNER AND MEANS**

It was part of the conspiracy that:

10. Defendant JAMES CUNNINGHAM purchased firearms from FFLs and



falsely stated on the Form 4473 for each firearm purchase that he was the actual purchaser of the firearm, when in fact defendant CUNNINGHAM knew this statement was false and planned to sell firearms for profit.

11. Defendant RICKIA ADAMS purchased firearms from FFLs and falsely stated on the Form 4473 for each firearm purchase that she was the actual purchaser of the firearm, when in fact defendant ADAMS knew this statement was false and planned to sell firearms for profit.

12. Defendants JAMES CUNNINGHAM, NAJEE CUNNIGHAM, and RICKIA ADAMS used cash, Cash App, and other electronic means, to pay for firearms purchased from FFLs and to receive payment from illegal firearms purchasers.

13. Defendants JAMES CUNNINGHAM, NAJEE CUNNIGHAM and RICKIA ADAMS transported firearms from other states into Philadelphia, Pennsylvania, to sell the firearms for profit.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its objects, defendants NAJEE CUNNINGHAM, JAMES CUNNINGHAM, and RICKIA ADAMS, committed the following overt acts, among others, in the Eastern District of Pennsylvania, the Eastern District of North Carolina, the Southern District of Ohio, the District of South Carolina, and elsewhere:

1. On or about June 19, 2020, defendant JAMES CUNNINGHAM purchased a Glock, Model 17, 9mm semi-automatic pistol, bearing serial number BNHN198, from a federally licensed dealer in Wilmington, North Carolina.

2. On or about August 26, 2020, defendant JAMES CUNNINGHAM purchased a Taurus, Model PT111G2, 9mm semi-automatic pistol, bearing serial number

ABH802561, from a federally licensed dealer in Wilmington, North Carolina.

3. On or about October 19, 2020, defendant JAMES CUNNINGHAM purchased two handguns, a Glock, Model 19X, 9mm semi-automatic pistol, bearing serial number AEVK741, and a Glock, Model 17Gen5, 9mm semi-automatic pistol, bearing serial number BRDP761, from a federally licensed dealer in Raleigh, North Carolina.

4. On or about December 7, 2020, defendant JAMES CUNNINGHAM purchased a Smith & Wesson, Model SD9VE, 9mm semi-automatic pistol, bearing serial number FCR0124, from a federally licensed dealer in Wilmington, North Carolina.

5. On December 28, 2020, defendant JAMES CUNNINGHAM obtained an Ohio Identification Card listing his address as 1912 Montrose Street, Cincinnati, Ohio.

6. On or about January 17, 2021, defendant JAMES CUNNINGHAM purchased a Glock, Model G19X, 9mm semi-automatic pistol, bearing serial number AFBH560, from a federally licensed dealer in Cincinnati, Ohio.

7. On or about March 1, 2021, defendant RICKIA ADAMS purchased two handguns, a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ABL178119, and a Smith & Wesson, Model SD9VE, 9mm semi-automatic pistol, bearing serial number FCU2045, from a federally licensed dealer in Mullins, South Carolina.

8. On or about March 3, 2021:

a. Defendant NAJEE CUNNINGHAM discussed the sale of firearms with another individual, listing a Smith & Wesson, Model SD9, semi-automatic firearm for sale.

b. Defendant NAJEE CUNNINGHAM received \$1,000 through Cash App from a user known the grand jury.

c. Approximately three minutes later, defendant NAJEE

CUNNINGHAM sent \$1,000 through Cash App to defendant RICKIA ADAMS.

9. On or about March 4, 2021, defendant RICKIA ADAMS purchased a Smith & Wesson, Model SD9VE, 9mm semi-automatic pistol, bearing serial number FDB8627, from a federally licensed dealer in Florence, South Carolina.

10. On or about March 9, 2021, defendant NAJEE CUNNINGHAM discussed the sale of firearms with another individual, listing a Smith & Wesson, Model SD9, semi-automatic firearm for sale.

11. On or about March 17, 2021, defendant RICKIA ADAMS purchased two handguns, a Glock, Model 17, 9mm semi-automatic pistol, bearing serial number BSHA889, and a Glock, Model 45, 9mm semi-automatic pistol, bearing serial number BSND699, from a federally licensed dealer in Florence, South Carolina.

12. On or about April 3, 2021, defendant JAMES CUNNINGHAM purchased a FNH, Model 509, 9mm semi-automatic pistol, bearing serial number GKS0170875, from a federally licensed dealer in Wilmington, North Carolina.

13. On or about April 4, 2021, defendant NAJEE CUNNINGHAM sent a message listing a "brand new F&N" 9mm firearm as available for sale.

14. On or about April 6, 2021:

a. Defendant RICKIA ADAMS purchased two handguns, a Glock, Model 22Gen5, .40 caliber semi-automatic pistol, bearing serial number BSMA991, and a Smith & Wesson, Model M&P 40, .40 caliber semi-automatic pistol, bearing serial number HYU7277, from a federally licensed dealer in Columbia, South Carolina.

b. Defendant JAMES CUNNINGHAM traveled from Wilmington, North Carolina, to Philadelphia, Pennsylvania.



15. On or about April 8, 2021, defendant JAMES CUNNINGHAM traveled from Philadelphia, Pennsylvania, to Wilmington, North Carolina.

16. On or about April 13, 2021, defendant JAMES CUNNINGHAM purchased three handguns, a Taurus, Model 856, .38 caliber semi-automatic pistol, bearing serial number ACB541817, a Glock, Model 45, 9mm semi-automatic pistol, bearing serial number BKLP441, and a Smith & Wesson, Model SW99, .40 caliber semi-automatic pistol, bearing serial number SAB7693, from a federally licensed dealer in Wilmington, North Carolina.

17. On or about April 14, 2021:

a. Defendant RICKIA ADAMS purchased two handguns, a Smith & Wesson, Model M&P 9 Shield EZ, 9mm semi-automatic pistol, bearing serial number NJV8804, and a Ruger, Model Max-9, 9mm semi-automatic pistol, bearing serial number 350003134, from a federally licensed dealer in Florence, South Carolina.

b. Defendant JAMES CUNNINGHAM traveled from Wilmington, North Carolina, to Philadelphia, Pennsylvania.

18. On or about April 15, 2021, defendant RICKIA ADAMS purchased four handguns, a Taurus, Model G3C, 9mm semi-automatic pistol, bearing serial number ACB580464, a Taurus, Model G3C, 9mm semi-automatic pistol, bearing serial number ABC519437, a Glock, Model 31Gen3, .357 caliber semi-automatic pistol, bearing serial number PTT075, and a Glock, Model 22Gen3, .40 caliber semi-automatic pistol, bearing serial number DZW861US, from a federally licensed dealer in Mullins, South Carolina.

19. On or about April 18, 2021, defendant JAMES CUNNINGHAM traveled from Philadelphia, Pennsylvania, to Wilmington, North Carolina.

20. On or about April 20, 2021, defendant JAMES CUNNINGHAM

purchased two handguns, a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ACC687442, and a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number ACB600980, from a federally licensed dealer in Raleigh, North Carolina.

21. On or about April 21, 2021, defendant JAMES CUNNINGHAM purchased three handguns, a Smith & Wesson, Model SD9VE, 9mm semi-automatic pistol, bearing serial number FDF4312, a Smith & Wesson, Model SD40VE, .40 caliber semi-automatic pistol, bearing serial number FDE6988, and a Smith & Wesson, Model SD9VE, 9mm semi-automatic pistol, bearing serial number FDF3007, from a federally licensed dealer in Raleigh, North Carolina.

22. On or about April 26, 2021:

a. Defendant JAMES CUNNINGHAM traveled from Warsaw, North Carolina to Philadelphia, Pennsylvania, arriving at approximately 8:15 a.m.

b. At approximately 11:22 a.m., defendant JAMES CUNNINGHAM traveled from Philadelphia, Pennsylvania, to Raleigh, North Carolina.

23. On or about May 3, 2021, defendant JAMES CUNNINGHAM purchased a FN, Model FNS-9C, 9mm semi-automatic pistol, bearing serial number GSU0033812, from a federally licensed dealer in Raleigh, North Carolina.

24. On or about May 24, 2021, defendant JAMES CUNNINGHAM purchased a Smith & Wesson, Model SD9VE, 9mm semi-automatic pistol, bearing serial number FYS2728, from a federally licensed dealer in Wilmington, North Carolina.

25. On or about May 28, 2021, defendant JAMES CUNNINGHAM purchased two handguns, a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number ACD839103, and a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number



ACD838986, from a federally licensed dealer in Apex, North Carolina.

26. On or about May 30, 2021, defendant NAJEE CUNNINGHAM sent a message listing the following firearms for sale: "Sd9 8 Xts 45 9 38 revolver 6." Defendant NAJEE CUNNINGHAM additionally indicated that his "bro" had the following firearms for sale: "Sdv9 3 G2c G3 F&N 9."

27. On or about June 2, 2021, defendant JAMES CUNNINGHAM traveled from Wilmington, North Carolina, to Cincinnati, Ohio.

28. On or about June 3, 2021, defendant JAMES CUNNINGHAM purchased two handguns, a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ACC728575, and a Taurus, Model G3C, 9mm semi-automatic pistol, bearing serial number ABG655009, from a federally licensed dealer in Cincinnati, Ohio.

29. On or about June 4, 2021, defendant JAMES CUNNINGHAM purchased two handguns, a Glock, Model 19Gen5, 9mm semi-automatic pistol, bearing serial number BSPE227, and a Taurus, Model G2S, 9mm semi-automatic pistol, bearing serial number ACD813449, from a federally licensed dealer in Cincinnati, Ohio.

30. On or about June 9, 2021, defendant JAMES CUNNINGHAM purchased a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number ACD838723, from a federally licensed dealer in Cincinnati, Ohio.

31. On or about June 10, 2021:

a. Defendant JAMES CUNNINGHAM purchased two handguns, a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number 1C043648, and a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number 1C043582, from a federally licensed dealer in Cincinnati, Ohio.

b. At approximately 10:00 p.m., defendant JAMES CUNNINGHAM traveled from Cincinnati, Ohio to Philadelphia, Pennsylvania, arriving at approximately 6:49 a.m.

32. On or about June 11, 2021, defendant NAJEE CUNNINGHAM sent a message listing the following firearms for sale: an “AR” and “a few compact G2s.”

33. On or about June 13, 2021:

a. At approximately 7:44 a.m., defendant JAMES CUNNINGHAM traveled from Philadelphia, Pennsylvania, to Cincinnati, Ohio, arriving at approximately 4:54 p.m.

b. Defendant JAMES CUNNINGHAM purchased four handguns, a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number ACE847322, a Taurus, Model G3C, 9mm semi-automatic pistol, bearing serial number ACE860589, a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number ACE883776, and a Glock, Model 45, 9mm semi-automatic pistol, bearing serial number BTGV472, from a federally licensed dealer in Cincinnati, Ohio.

c. Defendant JAMES CUNNINGHAM then traveled to another federally licensed dealer in Cincinnati, Ohio, and purchased three handguns, a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number 1C043576, a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number 1C036920, and a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number 1C306919.

34. On or about June 14, 2021, defendant RICKIA ADAMS, accompanied by defendant NAJEE CUNNINGHAM, traveled to a federally licensed dealer in Florence, South Carolina, and purchased two handguns, a Taurus, Model G3, 9mm semi-automatic pistol,

bearing serial number ACE880329, and a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ACC684039.

35. On or about June 15, 2021, defendant JAMES CUNNINGHAM purchased three handguns, a Smith & Wesson, Model SD9VE, 9mm semi-automatic pistol, bearing serial number FDJ1167, a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ACE880443, and a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ACE893792, from a federally licensed dealer in Cincinnati, Ohio.

36. On or about June 16, 2021, defendant NAJEE CUNNINGHAM received a message asking, “[W]hat’s next on the menu,” and another message requesting a “Compact 45 or 40.”

37. On or about June 17, 2021, defendant RICKIA ADAMS, accompanied by defendant NAJEE CUNNINGHAM, traveled to a federally licensed dealer in Darlington, South Carolina, and purchased two handguns, a Glock, Model 36, .45 caliber semi-automatic pistol, bearing serial number BSUG893, and a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number ACE896193.

38. On or about June 17, 2021, to June 18, 2021:

a. Defendants NAJEE CUNNINGHAM and RICKIA ADAMS traveled from Florence, South Carolina, to Philadelphia, Pennsylvania, arriving at approximately 6:06 a.m. on the 3100 block of North 16th Street, Philadelphia.

b. Defendant JAMES CUNNINGHAM traveled from Cincinnati, Ohio, to Philadelphia, Pennsylvania, arriving at approximately 6:19 a.m. on the 3100 block of North 16th Street, Philadelphia.

c. At approximately 11:38 a.m., defendants JAMES CUNNINGHAM



and NAJEE CUNNINGHAM left the 3100 block of North 16th Street, Philadelphia, in a red Nissan Altima owned by defendant JAMES CUNNINGHAM.

d. Defendant NAJEE CUNNINGHAM was in possession of a Glock, Model 36, .45 caliber semi-automatic pistol, bearing serial number BSUG893 purchased by defendant RICKIA ADAMS on June 17, 2021.

e. Defendant JAMES CUNNINGHAM was in possession of a Glock, Model 45, 9mm semi-automatic pistol, bearing serial number BTGV472, purchased on June 13, 2021, by JAMES CUNNINGHAM in Cincinnati, Ohio.

f. Defendants JAMES CUNNINGHAM and NAJEE CUNNINGHAM possessed the following nine handguns, wrapped in plastic in a backpack in the back seat of the car: a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number ACE883776; a Taurus, Model G3C, 9mm semi-automatic pistol, bearing serial number ACE860589; a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number ACE847322; a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ACE889443; a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ACE893792; a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number 1C036920; a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number 1C043576; a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number 1C306919; and a Smith & Wesson, Model SD9VE, 9mm semi-automatic pistol, bearing serial number FDJ1167.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 13, and Overt Acts 1 through 38, of Count One are incorporated here.

2. From in or around August 2020 through on or about June 18, 2021, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**NAJEE CUNNINGHAM,  
a/k/a "Disheem Thomas,"  
JAMES CUNNINGHAM, and  
RICKIA ADAMS,  
a/k/a "Kia,"**

willfully engaged in the business of dealing in firearms without being licensed to do so under the provisions of Chapter 44, Title 18, United States Code.

In violation of Title 18, United States Code, Sections 922(a)(1)(A), 924(a)(1)(D) and 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 18, 2021, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**NAJEE CUNNINGHAM,  
a/k/a "Disheem Thomas,"**

knowing he had previously been convicted in a court of the State of North Carolina of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is, a Glock, Model 36, .45 caliber semi-automatic pistol, bearing serial number BSUG893, loaded with 6 live rounds of ammunition, and the firearm was in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 922(g)(1).



**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Sections 371, 922(a)(1)(A), and 924(a)(1)(D) set forth in this indictment, defendants

**NAJEE CUNNINGHAM,  
a/k/a "Disheem Thomas,"  
JAMES CUNNINGHAM, and  
RICKIA ADAMS,  
a/k/a "Kia"**

shall forfeit to the United States of America the firearms and ammunition involved in the commission of this offense, including, but not limited to:

1. a Glock, Model 17, 9mm semi-automatic pistol, bearing serial number BNHN198;
2. a Taurus, Model PT111G2, 9mm semi-automatic pistol, bearing serial number ABH802561;
3. a Glock, Model 19X, 9mm semi-automatic pistol, bearing serial number AEVK741;
4. a Glock, Model 17Gen5, 9mm semi-automatic pistol, bearing serial number BRDP761;
5. a Smith & Wesson, Model SD9VE, 9mm semi-automatic pistol, bearing serial number FCR0124;
6. a Glock, Model G19X, 9mm semi-automatic pistol, bearing serial number AFBH560;
7. a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ABL178119;

8. a Smith & Wesson, Model SD9VE, 9mm semi-automatic pistol, bearing serial number FCU2045;

9. a Smith & Wesson, Model SD9VE, 9mm semi-automatic pistol, bearing serial number FDB8627;

10. a Glock, Model 17, 9mm semi-automatic pistol, bearing serial number BSHA889;

11. a Glock, Model 45, 9mm semi-automatic pistol, bearing serial number BSND699;

12. a FNH, Model 509, 9mm semi-automatic pistol, bearing serial number GKS0170875;

13. a Glock, Model 22Gen5, .40 caliber semi-automatic pistol, bearing serial number BSMA991;

14. a Smith & Wesson, Model M&P 40, .40 caliber semi-automatic pistol, bearing serial number HYU7277;

15. a Taurus, Model 856, .38 caliber semi-automatic pistol, bearing serial number ACB541817;

16. a Glock, Model 45, 9mm semi-automatic pistol, bearing serial number BKLP441;

17. a Smith & Wesson, Model SW99, .40 caliber semi-automatic pistol, bearing serial number SAB7693;

18. a Smith & Wesson, Model M&P 9 Shield EZ, 9mm semi-automatic pistol, bearing serial number NJV8804;

19. a Ruger, Model Max-9, 9mm semi-automatic pistol, bearing serial number 350003134;
20. a Taurus, Model G3C, 9mm semi-automatic pistol, bearing serial number ACB580464;
21. a Taurus, Model G3C, 9mm semi-automatic pistol, bearing serial number ABC519437;
22. a Glock, Model 31Gen3, .357 caliber semi-automatic pistol, bearing serial number PTT075;
23. a Glock, Model 22Gen3, .40 caliber semi-automatic pistol, bearing serial number DZW861US;
24. a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ACC687442;
25. a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number ACB600980;
26. a Smith & Wesson, Model SD9VE, 9mm semi-automatic pistol, bearing serial number FDF4312;
27. a Smith & Wesson, Model SD40VE, .40 caliber semi-automatic pistol, bearing serial number FDE6988;
28. a Smith & Wesson, Model SD9VE, 9mm semi-automatic pistol, bearing serial number FDF3007;
29. a FN, Model FNS-9C, 9mm semi-automatic pistol, bearing serial number GSV0033812;
30. a Smith & Wesson, Model SD9VE, 9mm semi-automatic pistol, bearing



serial number FYS2728;

31. a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number ACD839103;

32. a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number ACD838986;

33. a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ACC728575;

34. a Taurus, Model G3C, 9mm semi-automatic pistol, bearing serial number ABG655009;

35. a Glock, Model 19Gen5, 9mm semi-automatic pistol, bearing serial number BSPE227;

36. a Taurus, Model G2S, 9mm semi-automatic pistol, bearing serial number ACD813449;

37. a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number ACD838723;

38. a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number 1C043648;

39. a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number 1C043582;

40. a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number ACE847322;

41. a Taurus, Model G3C, 9mm semi-automatic pistol, bearing serial number ACE860589;

42. a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number ACE883776;
43. a Glock, Model 45, 9mm semi-automatic pistol, bearing serial number BTGV472;
44. a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number 1C043576;
45. a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number 1C036920;
46. a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number 1C306919;
47. a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ACE880329;
48. a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ACC684039;
49. a Smith & Wesson, Model SD9VE, 9mm semi-automatic pistol, bearing serial number FDJ1167;
50. a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ACE880443;
51. a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ACE893792;
52. a Glock, Model 36, .45 caliber semi-automatic pistol, bearing serial number BSUG893;

53. a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number ACE896193;

54. a Ruger pistol magazine;

55. eighteen live rounds of ammunition originally contained in a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ACE880329;

56. twenty-two live rounds of ammunition originally contained in Glock, Model 45, 9mm pistol, bearing serial number BTGV472;

57. six live rounds of ammunition originally contained in a Glock, Model 36, .45 caliber semi-automatic pistol, bearing serial number BSUG893;

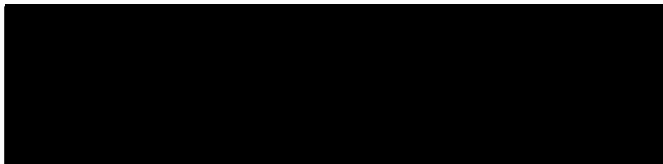
58. five live rounds of assorted ammunition in a plastic bag;


59. four live rounds of .357 SIG caliber ammunition; and

60. seventeen live rounds of Federal Ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**



  
**JACQUELINE C. ROMERO**  
United States Attorney



No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania

Criminal Division

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**THE UNITED STATES OF AMERICA**

vs.

**NAJEE CUNNINGHAM et al**

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**INDICTMENT**

**Counts**

18 U.S.C. § 371 (conspiracy – 1 count); 18 U.S.C. § 922(a)(1)(A), 924(a)(1)(D) (dealing in firearms without a license – 1 count); 18 U.S.C. § 922(g)(1) (possession of a firearm by a felon – 1 count); 18 U.S.C. § 2 (aiding and abetting); Notice of forfeiture

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A true bill.



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Filed in open court this 17th day,  
Of August A.D. 20 22

Clerk

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Bail, \$ \_\_\_\_\_

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